

NICHOLAS A. TRUTANICH
United States Attorney
Nevada Bar Number 13644
JARED L. GRIMMER
Assistant United States Attorney
District of Nevada
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
jared.l.grimmer@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SILVANO GONZALEZ-CASTRO,

Defendant.

Case No.: 2:19-cr-000130-APG-NJK

**Joint Stipulation to Continue
Government's Response to Defendant's
Motion to Dismiss (ECF No. 20), and
Defendant's Reply**

(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for Silvano Gonzalez-Castro, that the government's response to defendant's motion to dismiss (ECF No. 20) currently due on Tuesday, July 23, 2019, be vacated and continued to August 2, 2019, with defendant's corresponding reply due on August 9, 2019.

This Stipulation is entered into for the following reasons:

1. Government counsel continues to need additional time to properly respond to defendant's motion, to include researching the issues raised by the defendant.

2. Government counsel has requested a copy of records from the defendant's Immigration Court proceeding, and has not yet received these records. These records may be dispositive of the current motion.

3. Denial of this request for continuance could result in a miscarriage of justice.

4. This is the second request for continuance of the government response to defendant's motion to dismiss.

DATED this 19th day of July, 2019.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Monique Kirtley

By /s/ Jared L. Grimmer

MONIQUE KIRTLEY
Assistant Federal Public Defender

JARED L. GRIMMER
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SILVANO GONZALEZ-CASTRO,

7 Defendant.
8
9

Case No.:2:19-cr-000130-APG-NJK

10 IT IS THEREFORE ORDERED that the government's response to defendant's
11 motion to dismiss (ECF No. 20) currently due on Tuesday, July 23, 2019, be vacated and
12 continued to August 2, 2019, with defendant's corresponding reply due on August 9, 2019.

13
14 DATED this 19th day of July, 2019.

15 
16 UNITED STATES MAGISTRATE JUDGE
17
18
19
20
21
22
23
24